

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>
<b>THIS DOCUMENT RELATES TO:  ETHICON WAVE 11 CASES LISTED IN PLAINTIFFS' EXHIBIT A</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**DEFENDANTS' NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE OF  
STEVEN GOLDWASSER, M.D. FOR WAVE 11**

Plaintiffs filed a Notice of Adoption (Doc. No. 8487) in the Wave 11 cases identified in Exhibit A to their Notice, adopting their Motions to Exclude Expert Testimony of Steven Goldwasser, M.D., Doc. Nos. 3677/3678/3864 (“Plaintiffs’ Wave 4 Motion”) and Doc. Nos. 4365/4372 (“Plaintiffs’ Wave 5 Motion”).

Defendants hereby adopt and incorporate by reference their prior *Daubert* responses in Wave 4, Doc. No. 3754 and in Wave 5, Doc. No. 4553 as their response for Wave 11. Defendants respectfully request that the Court deny Plaintiffs’ motion for the reasons expressed in the Wave 4 and 5 response briefing.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

*/s/ William M. Gage*  
William M. Gage